

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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NEERAV DUDHWALA,

Plaintiff,

v.

**CHOICE HOTELS INTERNATIONAL
SERVICES CORPORATION D/B/A
CHOICE HOTELS, et al**

Defendants.

Civil Case No. 2:22-cv-00873-ES-MAH

CIVIL ACTION

**DECLARATION OF NEERAV
DUDHWALA**

1. I, Neerav Dudhwala, am the plaintiff in the above captioned case, and have personal knowledge of the facts stated herein.

2. I make this Declaration in support of the plaintiff's opposition to defendant's Motion to Dismiss plaintiff's Complaint.

3. During my employment with Choice Hotels, I went to the company office in Rockville, Maryland, on a couple of occasions, but conducted almost all of my business activity from my home office in Rockaway, New Jersey. My portfolio included Choice Hotels franchise

owners in Princeton, New Jersey. I also had a lunch meeting with a Choice hotel owner/advisory council member in Princeton, New Jersey.

4. In June 2021, Choice Hotels had fourteen (14) employees (including me) working out of defendant's "Home Office" in Trenton, New Jersey. *See* Choice Hotels NJ Home Office Employee list, a true copy of which is annexed hereto as "Exhibit B." Upon my information and belief, Choice Hotels deemed each of those persons to be field-based New Jersey employees with payroll withholdings going to the State of New Jersey.


5. On at least one (1) occasion, Choice Hotels paid the cost of me traveling from New Jersey for business purposes. If not for the COVID19 shutdown, I would have had face-to-face meeting and events in New Jersey because one of Defendant's Ascend Development team member is (or was) based in New Jersey, Ascend/Choice has several current and potential new franchisors based in New Jersey, and the company has Ascend flagged locations in New Jersey.

6. Several telephone conversations I had with my supervisor Janis Cannon took place while she was at her home in Georgia, rather than in Maryland.

7. Choice Hotels' Maryland corporate office was not open to associates like me until June 2021.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 4/4/2022



Neerav Dudhwala